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The Honorable Sean T. Connaughton
Administrator
U.S. Department of Transportation
Maritime Administration
Room 7206, MAR-100
400 Seventh Street, S.W.
Washington, DC 20590

From: Maryland

Docket No. MARAD-2007-26841 - 168

I am a U.S. Coast Guard licensed and/or certified Merchant Mariner. Regardless of whether a decision maker supports the importation of liquefied natural gas (LNG) to the United States, it is crucial to understand that in the event LNG is imported, then for safety and security concerns, the officers and crew aboard the ships delivering LNG must be U.S. Merchant Mariners.

A main point of opposition to siting LNG terminals is public concern with the safety and security issues surrounding LNG vessels delivering LNG to the United States. LNG carriers are highly specialized ships that transport LNG from foreign countries to the United States. In particular, LNG will be imported to the United States from foreign nations such as Libya, Nigeria and Middle East nations such as Oman, Qatar and United Arab Emirates. These nations are sometimes politically unstable or are unable to effectively protect the national security interest of the United States.

Preliminarily, nearly 97% of all shipboard cargo entering the United States is carried on vessels that are not operated under United States Flag registry. Further, 100% of all vessels currently delivering LNG to the United States are not U.S.-flagged. This means the vessels are staffed by workers (mariners) that are not U.S. citizens or citizens lawfully admitted for permanent residence. This creates a security threat because thorough background checks cannot be completed on non-U.S. citizen mariners. The best way to protect the public from the dangers of waterborne entrance of LNG is by requiring that the vessels be operated under U.S.-Flag registry. Short of that would be a requirement for U.S. Officers and crews on the LNG Tankers.

Indeed, all United States Merchant Mariners must undergo extensive and thorough background checks. U.S. Merchant Mariners are regulated by several agencies including the U.S. Coast Guard, Transportation Security Administration and the Department of Transportation. American mariners must undergo extensive background checks by the Federal Bureau of Investigation (FBI) in order to work on ocean going vessels. The foreign citizens who staff the LNG tankers delivering cargo to the citizens of the United States do not. Additionally, in order to sail aboard ocean going vessels, U.S. Merchant Mariners are required to provide extensive background information to the United States Coast Guard—the U.S. agency responsible for issuing licenses and credentials to U.S. citizens who work in shipboard employment. The foreign citizens who staff the LNG

tankers delivering cargo to the citizens of the United States do not. Moreover, U.S. Merchant Mariners undergo an extensive background check through a national driver agency database in order to check the driving records of those engaged in ocean going transportation. The foreign citizens who staff the LNG tankers delivering cargo to the citizens of the United States do not. Finally, all U.S. Merchant Mariners will be required to undergo terrorist background checks through either the U.S. Coast Guard and/or the Transportation Security Administration (TSA) as a result of legislation passed in the 109th Congress. This background check is a requirement for mariners to receive an identification card known as the Transportation Worker Identification Card (TWIC). The foreign citizens who staff the LNG tankers delivering cargo to the citizens of the United States will not.

In order to best serve and protect the American public, LNG ships entering United States need to be staffed by fully licensed and certified by the U.S. Coast Guard Merchant Mariners. Only with the utilization of U.S. mariners staffing LNG vessels can the United States government best ensure the utmost dedication to the safe and secure delivery of natural gas to our coastal communities. With fluently English speaking and thoroughly vetted U.S. Merchant Mariners onboard LNG vessels, they would be in charge of vessels at the point of origin where the LNG is loaded onto to vessels. Therefore, U.S. Merchant Mariners would be in charge of who comes aboard the vessels overseas. And, finally they have an absolute interest in protecting the security of the LNG in order to make absolutely sure that nothing goes wrong because these U.S. mariners care deeply for their country. The time is now to implement this U.S. Merchant Mariner policy before any more terminals are permitted in the United States.

Finally, there is no dispute that U.S. Merchant Mariners either already are or can be qualified to sail aboard LNG Tankers. This is especially true when taking into consideration that more than a supermajority of the LNG tankers in operation and scheduled to be built are steam propelled. Indeed, the United States Merchant Marine has more steam vessels in operation or in reserve status than any other nation in the world. Moreover, without question, the United States has more training programs and indeed trains more merchant mariners in the principles of steam systems than any other nation in the world.

In the end, regardless of whether one supports or opposes the importation of LNG to their community, one thing is certain-- if LNG is delivered by waterborne transportation to the United States, the vessels carrying the cargo must be staffed by qualified and thoroughly background checked U.S. citizen crews. The American people deserve nothing less.

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